

Timothy Barnes
590 South Greenwood Rd.
Independence, Oregon 97351
503-585-9517

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

Timothy Barnes, an individual §

Plaintiff,

-vs-

Routh Crabtree Olsen, PC,
John Thomas, OSB # 024691
Janaya Carter, OSB # 032830
Shayda Zaepoor Le,
OSB # 121547
Federal National Mortgage
Association,
Seterus, Inc.,
JOHN AND JANE DOES 1 - 10

DEFENDANTS

3'15 CV-1001 BR
Case No.:

complaint

TO THE HONORABLE UNITED STATES DISTRICT JUDGE

I. Preliminary Statement

Plaintiff _____ brings this action against
_____, _____, and John and Jane Does
(collectively "Defendants")

II. Parties

Plaintiff Timothy Barnes, *pro se*, 590 South Greenwood Rd.,
Independence, Oregon 97351

Defendant Routh Crabtree Olsen, PC, 511 SW 10th Avenue,
Suite 400, Portland, Oregon 97205

Defendant John M. Thomas, 511 SW 10th Avenue, Suite 400,
Portland, Oregon 97205

Defendant Janaya Carter, 511 SW 10th Avenue, Suite 400,
Portland, Oregon 97205

Defendant Shayda Zaepoor Le, 511 SW 10th Avenue, Suite 400,
Portland, Oregon 97205

Defendant Federal National Mortgage Association, 3900
Wisconsin Avenue NW, Washington, DC 20016 (14221 Dallas
Parkway, Suite 1000, Dallas, Texas 75254) and by serving
the Oregon Secretary of State, 255 Capital Street NE, Suite
151, Salem, Oregon 97310

Defendant Seterus, Inc., f/k/a IBM Lender Business Process
Services, Inc., 14523 Millikan Way, Suite 200, Beaverton,
Oregon 97005, Afzal Assur, President, 8501 IBM Dr. Bldg.
201, Suite 2DD 188, Charlotte, North Carolina 28262 and by
serving its statutory agent CT Corporation System, 388
State Street, Suite 420, Salem, Oregon 97301.

Defendants John and Jane Does

Jurisdiction/Venue

This Court has Jurisdiction in this proceeding pursuant
to 28 U.S.C. § 1331, pursuant to 15 U.S.C. § 1692k(d) for
Fair Debt Collection Practices Act ("FDCPA") and pursuant

to 28 U.S.C. § 1367 for supplemental jurisdiction of Plaintiff's state law claims because Plaintiff's claims are so related to the claims within the court's original jurisdiction that they form part of the same case or controversy under Article 3 of the United States Constitution. The Court has authority to issue a declaratory judgment by virtue of 28 U.S.C. § 2201. Counts arising under contract, common law, and the law of conveyances in real property are properly asserted under this Court's pendent jurisdiction.

Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 generally whereby the real property and a substantial part of the events and claims, the subject of this suit, are situated in this district.

IV. Conditions Precedent

All conditions precedent have been performed or have occurred

VI. Statement of Facts

1. Defendants violated federal and state law

VI. Claims for Relief

Count 1 - FDCPA

1.

Count 2 - OREGON STATE LAW

1.

VII. Jury Trial Demand

Pursuant to the seventh amendment to the Constitution of the United States of America, Plaintiff is entitled to, and hereby demands a trial by jury.

VIII. Prayer for Relief

WHEREFORE, as a result of the violations of the FDCPA Plaintiff prays for judgment against Defendants as follows:

1. Statutory damages under federal law
2. Statutory damages under state law
3. Actual damages in an amount to be determined at trial
4. Reasonable attorney fee
5. For such other relief as the court may deem just and proper

Dated: June 3, 2015

By



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